MARICOPA COUNTY ENVIRONMENTAL SERVICES DEPARTMENT AIR QUALITY DIVISION

NUMBER AP-01 November 12, 1998

Standard Operating Procedure Air Quality Permits Unit Managers

- I. <u>PURPOSE</u>: To clarify and standardize the authorities' responsibilities and standards of performance of the air permits group managers.
- II. <u>APPLICABILITY</u>: This operating procedure applies to Division personnel in the air Permit group.
- III. <u>POLICY:</u> All employees of the air permits group shall read, understand and comply with these procedures as they apply to each individuals' daily activities.
- IV. PROCEDURES:
- A. Air Permits Units The air permits program is divided into the following two (2) Units
 - 1. Non-Title V Sources Unit (including synthetic minor sources)
 - 2. Title V Sources and General Permits Unit

B. Unit Manager Authority

- 1. Authority for all permits that meet the group definition. If an engineer from another Unit works on a permit, the engineer shall work under the direction of that manager.
- 2. The manager has the authority to review all permits and is accountable for all decisions regarding that permit.
- 3. The manager has the authority to manage all staff assigned to the Unit. No personnel can be assigned to another group without the concurrence of the division manager. The manager shall be involved in all decisions relating to his/her staff.
- 4. Authority to determine the permit conditions.
- 5. Authority for his group decisions only.

C. Unit Manager Responsibilities

- 1. Time management of his/her Unit only.
- 2. Personnel management of his/her Unit.
- 3. Training of new engineers in his/her group. This will include training on the basic air pollution control rules and regulations, training on how to use the data base to issue a permit, training of the new engineer on the procedures to be followed to insure that the permit is filed correctly, forwarded to the regional offices correctly, etc.

- 4. Analyze the performance of the engineer in issuing permits. Track how many, how often, quality, etc.
- 5. Manage the backlog. This will include on a regular basis reviewing the individual engineers backlog discussing the backlog with the engineer, and making a decision as to the procedure to follow to eliminate the item from the backlog.
- 6. Develop procedures for his/her Unit. This will insure consistency among the engineers in issuing permits for the Unit.
- 7. Develop new standard permit conditions as new rules are passed by the Board of Supervisors.
- 8. Provide support to the engineers in the Unit in developing permits.
- 9. Provide external technical guidance to permit applicants, the general public, individual organizations and environmental groups.
- 10. Participate and make presentations at professional conferences, seminars and meetings.
- 11. Participate in another air pollution control programs such as planning, rule making etc.
- 12. Assist organizations such as Greater Phoenix economic council to provide information on permitting.
- 13. Assign permits to individual engineers. This is done after the permit has been assigned to the group by the permits manager

D. Unit Specific Responsibilities and Standards of Performance.

1. AREAS OF RESPONSIBILITY -- Non-Title V Sources Unit Manager

The areas of responsibility are listed below in the order of priority:

- a) Issue permits to Non-Title V sources
- b) Convert existing sources under the old dual air quality permit system to new unitary air quality permit system. Manage the ninety day letter program.
- c) Process minor modifications, seven day notices, permit transfers, administrative amendments, and changes without permit revisions.
- d) Conduct joint inspections with Compliance Unit on new permitted Non-Title V sources as required.
- e) Prepare additional standard permit conditions for various types of industries including sources that are subject to NSPS, NESHAP, and MACT, etc..
- f) Standardize calculations for allowable emissions.
- g) Develop and improve computer skills in Access, Winword and Excel. Establish database of key permitting data for permits tracking and reporting. Coordinate the implementation of a Department wide computer database system: Environmental Management System (EMS). Also, each engineer is expected to develop computer modeling techniques through training.
- h) Finalize application forms for Synthetic Minor, Non-minor permit revisions, etc.

2. STANDARDS OF PERFORMANCE -- Non-Title V Sources Unit Manager

The following standards of performance will be developed for the unit:

TABLE B SOURCES

- a) Process 80% of Table B sources applications within sixty (60) days of receipt. Process defined as engineering review of the application and publish for public notice.
- b) Continue to standardize the Permit conditions for use by Table B sources.
- c) Standardize the calculation procedures for small sources so that all emissions are calculated consistently.
- d) Establish mail list of permittee's with old permits to be converted to the new permit system. Approximately 75 letters per month will be sent out requesting that permittee's submit a "Blue Form" for their facility. Manage the system to ensure permits received in the required ninety days.
- e) Update soil remediation guidelines.
- f) Improve permit application format, both hard copy and computer entry format.

TABLE A SOURCES / SYNTHETIC MINOR/OTHER NON-TITLE V SOURCES

- a) Issue permits to large sources including Table A, synthetic minor .
- b) Convert existing large sources under the old permit system to new air quality permits.
- c) Process Synthetic Minor applications.
- d) Conduct joint inspections with Field Services Division on permitted large sources.
- e) review applications for Changes with 7-day notices, Minor Modifications and Non-minor Modifications of the permitted large sources.

3. AREAS OF RESPONSIBILITY - Title V Sources Unit & General Permits Manager

- a) Develop Title V permit application tracking system.
- b) Become familiar with all requirements relating to Title V permit program.
- c) Develop training plan for new engineers entering the Title V Permits Unit.
- d) Perform completeness review of Title V permit applications.
- e) Review applications for Changes with 7-day notices, Minor Modifications and Significant Modifications to the permitted Title V sources.
- f) Process Title V permit applications.
- g) Monitor and provide guidance to EPA Superfund cleanups.
- h) Conduct joint inspections with Compliance Unit on permitted Title V sources.
- I) Will assume responsibilty for General Permit (gasoline stations) Program Implementation.
- j) Develop and improve computer skills in Access, Winword and Excel, as well as EMS computer database system.

4. STANDARDS OF PERFORMANCE - Title V Sources & General Permits Unit Manager

In order to establish minimum standards and maintain consistency in reviewing/issuing of permits, the following will be developed:

- a) Prepare Title V permit application completeness checklist.
- b) Prepare standard general permit conditions for Title V
- c) Utilize specific standard permit conditions when applicable.
- d) Implement General Permits Program
- e) Work with Business Services Division to develop computerized application forms.

The above-mentioned definitions, authorities, responsibilities and standards of performance can be modified with the concurrence of the Division Manager.

Attachments: none	
	 Division Manager
	Date